

The closest prior art to Richards (US 5,270,812) discloses computing pairwise color averages of pairs of pixels and storing the color averages, the averaging comprises: converting the luminance index and chrominance index of each pixel to coordinates of a point in a three dimensional color space, and obtaining the mean of the resulting two points in the color space but fail to anticipate or render the limitation obvious.

Further, the Statement includes, in section 4 on page 3, the following recitation:

The closest prior art to Richards (US 5,270,812) discloses computing pairwise color averages of pairs of pixels and storing the color averages but fail to anticipate or render the limitation obvious.

Applicants believe that the above-quoted portions of the Statement may characterize the prior art in a manner inconsistent with the position of Applicants. For example, Applicants do not necessarily concur that the Richards reference provides the teachings attributed thereto by the Examiner in the above-quoted recitations.

Applicants believe that each of the independent claims 1 and 5 is allowable because the particular limitations thereof are not taught or suggested by the collective teachings of the art of record. To the extent that the Statement includes language which deviates from the actual language used in the particular limitations of these claims, or language which characterizes the prior art in a manner inconsistent with the position of Applicants, the Statement is respectfully traversed.

Respectfully submitted,



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